

Joyce W. Lindauer
State Bar No. 21555700
Joyce W. Lindauer Attorney, PLLC
1412 Main Street, Suite 500
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Telephone: (972) 503-4033
Facsimile: (972) 503-4034
PROPOSED ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	
	§	
CELESTIAL PRODUCTS USA LLC,	§	CASE NO. 25-40153-mxm
	§	
Debtor.	§	Chapter 11, Subchapter V

MOTION FOR SUBSTITUTION OF COUNSEL

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 501 W. TENTH STREET, ROOM 147, FORT WORTH, TEXAS 76102 ON OR BEFORE APRIL 23, 2025, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Celestial Products USA LLC, debtor in the above-styled and numbered case ("Debtor"), and files this its Motion for Substitution of Counsel seeking permission to substitute Joyce W. Lindauer Attorney, PLLC as attorney of record for the Debtor in this case.

1. The Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue is proper before the Court under 28 U.S.C. §§ 1408 and 1409.

2. On January 16, 2025, the Debtor filed a voluntary petition for relief under Subchapter V of Chapter 11 of the U.S. Bankruptcy Code.

3. On February 11, 2025, the Court entered an Order granting the Application of the Debtor to employ The Lane Law Firm, PLLC as attorney for the Debtor [Docket No. 40].

4. The Lane Law Firm, PLLC, current counsel for the Debtor, has filed or soon will file a motion to withdraw.

5. Joyce W. Lindauer Attorney, PLLC has been employed to represent Debtor as of April 1, 2025, subject to approval of the Court. Debtor approves of this substitution. This substitution is not sought for delay.

6. The Debtor is concurrently herewith filing an application to employ Joyce W. Lindauer Attorney, PLLC as its counsel.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully requests the Court to enter an order substituting Joyce W. Lindauer Attorney, PLLC as counsel for the Debtor and discharging The Lane Law Firm, PLLC as attorney of record for the Debtors.

Dated: April 2, 2025.

Respectfully submitted,

/s/ Joyce W. Lindauer

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Proposed Attorneys for Debtors

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 2, 2025, a true and correct copy of the foregoing document was served via United States first class mail, postage prepaid, upon the parties on the attached service list.

/s/ Joyce W. Lindauer

Joyce W. Lindauer

Label Matrix for local noticing

0539-4

Case 25-40153-mxm11

Northern District of Texas

Ft. Worth

Wed Apr 2 14:25:51 CDT 2025

Tarrant County

Linebarger Goggan Blair & Sampson, LLP

c/o John Kendrick Turner

3500 Maple Avenue

Suite 800

Dallas, TX 75219-3906

AIRGAS DRY ICE

PO BOX 736148

DALLAS, TX 75373-6148

American Express National Bank

c/o Becket and Lee LLP

PO Box 3001

Malvern PA 19355-0701

Celestial Products USA LLC

6001 Tension Dr

Fort Worth, TX 76112-6937

Cobalt Funding Solution

c/o Giuliano Law PC

445 Broadhollow Rd., Suite 25

Melville, NY 11747-3645

Commercial Bank of California

c/o David Golubchik, Esq.

Levene, Neale, Bender, Yoo & Golubchik L

2818 La Cienega Ave

Los Angeles, CA 90034-2618

Jose Felix Silva

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Santee, CA 92071-3237

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c/o John Kendrick Turner

2777 N. Stemmons Freeway Suite 1000

Dallas, TX 75207-2328

Padrino Foods

3210 Conflans Rd

Irving, TX 75061-6338

Celestial Products USA LLC

3000 S Hulen St Ste 124

Fort Worth, TX 76109-1934

Texas Comptroller of Public Accounts, Revenu

Callan Searcy

P.O. Box 12548

Austin, TX 78711-2548

AirGas

26 Pleasant St Suite B

Concord, NH 03301-4072

BlueVine Capital Inc.

401 Warren St 300

Redwood City, CA 94063-1536

Cellco Partnership d/b/a Verizon Wireless

William M Vermette

22001 Loudoun County PKWY

Ashburn, VA 20147-6122

Commercial Bank of California

19752 Macarthur Blvd Ste 100

Irvine, CA 92612-2409

Credit Key

10573 W Pico Blvd

Los Angeles, CA 90064-2333

Joseph Rice Jr.

1312 Minden Dr

San Diego, CA 92111-7118

Moses, Palmer, Howell LLP

The Fort Worth Club Building

306 West 7th Street Suite 504

Fort Worth, TX 76102-4905

PayPal Working Capital

PO Box 45950

Omaha, NE 68145-0950

Cobalt Funding Solutions

c/o Giuliano Law PC

Anthony Giuliano

445 Broadhollow Rd.

Suite 25

Melville, NY 11747-3645

501 W. Tenth Street

Fort Worth, TX 76102-3637

American Express

Bankruptcy Unit

P.O Box 297817

Fort Lauderdale, NY 33329-7817

(p)CAPITAL ON TAP

675 PONCE DE LEON AVE NE

STE 8500

ATLANTA GA 30308-1884

Celtic Bank

c/o BlueVine Capital Inc.

268 South State Street Suite 300

Salt Lake City, UT 84111-5314

Commercial Bank of California

Attn: EVP/CCO Christopher Colella

19752 Macarthur Blvd, Suite 100

Irvine, CA 92612-2409

Credit Key

145 S. Fairfax Ave 2nd Floor

Los Angeles, CA 90036-2166

(p)LEAD BANK

1801 MAIN STREET

KANSAS CITY MO 64108-2352

Munck Wilson Mandala, LLP

1330 N Post Oak Rd Ste 2850

Houston, TX 77055

Reliant Atlantic Group LLC

PO Box 679274

Dallas, TX 75267-9274

TD Auto Finance
PO Box 100295
Columbia, SC 29202-3295

TD Bank, N.A., successor in interest to
TD Auto Finance LLC
P.O. Box 551080
Jacksonville, FL 32255-1080

TD Bank, N.A., successor in interest to
TD Auto Finance LLC
c/o Wilcox Law, PLLC
P.O. Box 201849
Arlington, TX 76006-1849

Tarrant County Tax Assessor-Collector
100 E. Weatherford Street
Fort Worth, TX 76196-0206

Texas Comptroller of Public Accounts
C/O Office of the Attorney General
Bankruptcy - Collections Division MC-008
PO Box 12548
Austin TX 78711-2548

Texas Tamale Company, Inc.
14453 Hillcroft St Ste 200
Houston, TX 77085-1536

The Klein Law Firm, LLC
ATTN: Yehuda Klein, Esq.
P.O. Box 714
Lakewood, NJ 08701-0714

The Lane Law Firm
1555 State St
Salem, OR 97301-4255

U.S. Small Business Administration
150 Westpark Way
Suite 130
Eulless, TX 76040-3705

U.S. Small Business Administration (SBA) - A
Little Rock Commercial Loan Servicing Ce
2120 Riverfront Drive 100
Little Rock, AR 72202-1794

United States Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-0996

WebBank
215 S State St Ste 1000
Salt Lake Cty, UT 84111-2336

Areya Holder Aurzada (SBRA V)
Holder Law
PO Box 2105
Addison, TX 75001-2105

(p)JOYCE W LINDAUER ATTORNEY PLLC
1412 MAIN STREET
SUITE 500
DALLAS TX 75202-4042

Robert Lane
The Lane Law Firm PLLC
6200 Savoy Dr Ste 1150
Houston, TX 77036-3369

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Capital on Tap
675 Ponce De Leon Ave NE 8500
Atlanta, GA 30308-1884

Lead Bank
1801 Main St
Kansas City, MO 64108

Joyce W. Lindauer
Joyce W. Lindauer Attorney, PLLC
1412 Main Street
Suite 500
Dallas, TX 75202

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Small Business Administration

(u)TD Bank, N.A., successor in interest to TD

(u)The Lane Law Firm, PLLC

(d)Tarrant County
Linebarger Goggan Blair & Sampson, LLP
c/o John Kendrick Turner
3500 Maple Avenue
Suite 800
DALLAS, TX 75219-3906

End of Label Matrix
Mailable recipients 44
Bypassed recipients 4
Total 48